Allen Family Foods, Inc.

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Monday, January 30, 2006

Mr. Allen McCloskey
State of Delaware
Department of Natural Resources and Environmental Control
Division of Water Resources
89 Kings Highway
Dover, Delaware 19901

RE: TSS Violation

Dear Mr. McCloskey:

This letter is to provide written confirmation of the voicemail left on January 30, 2006, of a Total Suspended Solids violation noted on the 1/11/06 composite sample for Outfall 001. Today I received the results from the referenced composite sample and notice that the TSS result was 35.1 mg/L which exceeds our permit limit of 23 mg/L.

We believe that the violation is a result of an abnormal chain of events that temporarily left us without pH control. During the week of December 16, 2005 we experienced very cold conditions and we were not able to maintain 55 degrees Fahrenheit in our chemical storage building. As you know 50% caustic crystallizes below 55 degrees F. This crystallization occured right at the reducer coming from our bulk storage tank. As a result, our LMI chemical feed pump was damaged from pumping dry. Once we were able to free the flow from the bulk tank we were not aware of the pump damage. The unit's pumping rate would vary and ultimately would not deliver adequate amounts of caustic. During the holiday weekends, Christmas and New Years, the plant was shut down for 3 days at a time. This extended shutdown allowed the nitrification process to consume a large portion of the plant's alkalinity. Without the ability to feed adequate amounts of caustic we were forced to shut off the aluminum chloride feed to the clarifier due to the acidic nature of the flocculant. So in conclusion we feel that the high TSS was a result of inhibited biological activity due to low pH conditions and inability to utilize the aluminum chloride flocculant due to it's inherent acidic properties. We were able to increase pH of the system with a new caustic feed pump and 25% caustic solution. Improvements in effluent quality were noted Friday January 13, 2006 by the operators, and the effluent continued to improve as the system returned to normal operating conditions.

Corrective measures include installation of a new caustic feed pump and rebuilding the existing pump for back up; switching to a 25% caustic solution to prevent crystallizing of the product; and out sourcing a project to install a dedicated caustic feed line with pH controller to the CMAS tank for rapid pH adjustment.

If any additional information is needed please do not hesitate to contact me at 302-684-1640.

Very truly yours,

Michael Hall
Wastewater Manager